

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

1 CONGRESS STREET, SUITE 1100, BOSTON, MASSACHUSETTS 02114-2023

## MEMORANDUM

**DATE:** August 24, 2005

**SUBJ:** PCB Risk-Based Cleanup and Disposal Approval  
McCoy Field (New Keith Middle School), New Bedford, MA

**FROM:** Kimberly Tisa, PCB Coordinator, Chemicals Management Branch

**THRU:** Marv Rosenstein, Branch Chief, Chemicals Management Branch

**TO:** Robert W. Varney, Regional Administrator

## SUMMARY

The attached letter approves the City of New Bedford's request to clean up, dispose of, and cap PCB-contaminated materials at its property known as McCoy Field in New Bedford, Massachusetts (the Site), where the City is building the new Keith Middle School. The cleanup approach is consistent with TSCA, and is protective of human health and the environment.

## BACKGROUND

The Site comprises approximately 7 acres and is located across from the New Bedford High School. Debris from a City burn dump and possibly other disposals of PCBs have contaminated the McCoy Field and High School sites with PCBs in the 1960's and 70's.

As part of the Keith Middle School construction project, sampling identified PCB concentrations at greater than 50 parts per million (ppm), as well as metals and semi-volatile organic compounds (SVOCS). Due to the nature of the contamination, cleanup and disposal of the PCB-contaminated materials are regulated under the federal PCB regulations at 40 CFR Part 761.

A Region I Consent Agreement with the City in 2004 required the proper disposal of the highest levels of PCB contamination (up to 46,500 ppm). Under that agreement, the City submitted a risk-based cleanup and disposal plan under the federal PCB regulations at §761.61(c) to address the remaining (unexcavated) PCB contamination at the Site. The cleanup includes the removal of PCBs at  $\geq 100$  ppm in the excavation areas; a 3-foot soil cap in landscaped areas; a 2-foot cap underneath paved areas; a passive vent system, solid vapor barrier, and 2-foot clean cap in the building footprint; and an Activity and Use Limitation on the Site (a control to prevent improper use of the Site, such as playground areas). Finally, long-term monitoring and maintenance of the caps, and monitoring of groundwater, sediment, vent gases and indoor air quality, are designed to maintain the integrity of the physical control measures and to ensure that PCBs are not migrating from the Site.

The City's plan does not directly address cleanup of PCB-contamination in the adjacent wetlands, on nearby private properties, or at the existing High School and Keith Middle School. Based on the information to date, PCBs, metals, and/or SVOCs have also been found on the High School property and in the wetlands. Accordingly, the attached Approval requires the City to evaluate the properties and to submit cleanup plans where required by TSCA. In addition, the attached Approval requires a separate TSCA approval for cleanup of the adjacent wetlands. The City has submitted its cleanup plan for the wetlands, which is currently under review by EPA.

*(See attached Technical Support Document for more information.)*

### **NATURE OF ACTION**

The PCB regulations allow a site owner to leave on-site residual PCB contamination above the default cleanup levels (< 1 ppm without institutional controls), provided there is no unreasonable risk to human health or the environment. Based on the risk assessment submitted by the City, and on the conditions of the attached Approval, the cleanup and use of the property will not present an unreasonable risk to human health or the environment. *(See attached Technical Support Document for more information.)*

### **Approval Conditions**

The Approval requires the City to submit work plans for the long-term monitoring and maintenance program for the caps, for groundwater and sediment monitoring, and for vent gas and indoor air monitoring. These work plans must include specific details on the monitoring and maintenance activities, including the actions that will be taken to address any potential repair of the cap and actions to be taken should PCBs be found during groundwater, sediment, vent gases, or indoor air monitoring. Such actions require EPA review and approval.

To address public concerns raised during public meetings, the Approval also requires: (1) the City to submit a communication plan which details how the monitoring/maintenance activities and results will be communicated to Site users, the public and other stakeholders; and (2) the City to submit a worker training plan which will detail requirements for on-going training of workers conducting routine site work, such as landscapers, so as not to disturb the controls in place. The Approval reserves EPA's right to require the City to undertake additional measures if EPA determines that the PCBs at the Site are creating an unacceptable risk to site users and/or if PCBs are migrating from the Site.

After completion of remedial activities, the City must record an Activity and Use Limitation with the property's deed, which will identify permitted and prohibited activities at the Site.

### **COMMUNITY INVOLVEMENT**

EPA published notification of a public comment period on the draft PCB Risk-Based Cleanup and Disposal Approval in the *New Bedford Standard Times* on June 14, 2005. This notification

also was sent to over 200 citizens. EPA held a public information meeting on June 22, 2005 to provide information on the remedial plan and to answer questions. EPA then extended the comment period to July 29, 2005. Public comments are addressed in Attachment 3, Response to Comments. In addition, the City has conducted through the MADEP PIP process, regular public meetings to solicit comments and input regarding proposed actions at the Site. All relevant documents have been made available for review on EPA's website, at a public repository and on the City's website.

The primary issue of concern has been the City's decision to site the Keith Middle School on a contaminated property. EPA has regularly attended these public meetings and has repeatedly stated that EPA's responsibility is to ensure that the school is safe (that users are protected from exposure to contaminants at the Site), and that EPA does not have authority over local school siting decisions.

### **CONGRESSIONAL INTEREST**

While EPA has not received any correspondence from congressionals on this proposed cleanup, Congressman Frank's staff is aware of the issues at the Site and EPA's role and actions to date. According to his staff, Congressman Frank's greatest concerns are that EPA follow all steps required by law, and that long term monitoring and cap maintenance be adequate to ensure the safety of school children.

This is an election year for the Mayor of New Bedford, and there are local and state elected officials that have not supported construction of the school at this location.

### **STATE COORDINATION**

The Site is regulated under both the federal PCB regulations and the state regulations under the MCP, and EPA and the Massachusetts Department of Environmental Protection (MADEP) have been coordinating closely on this project.

### **RECOMMENDATION**

Based on EPA's review of the information provided by the City and in consideration of the comments submitted by the public and raised through public meetings, the City's proposed risk-based cleanup and disposal plan complies with EPA requirements for remediation of the PCB-contaminated materials. Based on the risk assessment, there will be no unreasonable risk to public health or the environment. Conditions will be monitored per approved work plans, and EPA has the authority to impose additional measures should that become necessary. Monitoring must continue until both EPA and MADEP determine that monitoring is no longer necessary. Finally, this approach has been used successfully at school sites in New England contaminated with chemicals similar to PCBs (e.g. metals, SVOCs, PAHs, etc). Therefore, I recommend the issuance of the attached Approval.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 1**  
**1 Congress Street, Suite 1100**  
**BOSTON, MA 02114-2023**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Scott Alfonse, Director  
City of New Bedford  
Department of Environmental Stewardship  
133 William Street  
New Bedford, Massachusetts 02740

Re: Approval for Risk-Based PCB Cleanup and Disposal under 40 CFR §761.61(c)

Dear Mr. Alfonse:

This is in response to the City of New Bedford (the City) application for approval of a risk-based plan to address PCB-contaminated materials at the property known as the McCoy Field, located on Hathaway Boulevard, New Bedford, Massachusetts (the Site).<sup>1</sup> The Site contains PCB-contaminated materials that exceed allowable PCB levels under the federal PCB regulations at 40 CFR §761.61.

The City has proposed to construct a school on the Site and has submitted a proposed cleanup plan that includes the following major activities:

- Removal and off-site disposal of PCB-contaminated soils with PCBs greater than or equal to 100 parts per million ( $\geq 100$  ppm) in the excavation areas;
- Installation of at least two (2) feet of clean granular/soil cover in paved areas and at least three (3) feet of clean soil cover in landscaped areas;
- Installation of at least two (2) feet of clean material, a passive vapor ventilation system and solid vapor barrier in the building footprint;
- Establishment of institutional controls and deed restrictions, including recording an Activity and Use Limitation to restrict exposure to soil and disturbance of soil at the Site; and
- Establishment of a long-term monitoring plan for groundwater and indoor air quality, and a maintenance and monitoring plan for the surface covers (caps), including the building floor.

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<sup>1</sup> Information was submitted on behalf of the City of New Bedford by BETA Group to support a risk-based cleanup and disposal approach for PCB remediation waste under 40 CFR §761.61(c). Attachment 2 provides a list of supporting information for this request. These submissions will be referred to as the "Application."

EPA published notice soliciting comment on the *draft* approval in the *New Bedford Standard Times* on June 14, 2005 and held an informational meeting on June 22, 2005. EPA received two sets of written comments on the technical remedial design and risk assessment methodology. These comments and EPA's responses are included as Attachment 3.

In the attached Approval Conditions, Attachment 1, EPA has added conditions for characterization and remediation of the New Bedford High School, potentially affected nearby private properties and athletic fields, and the existing Keith Middle School. (The wetlands adjacent to the Site will be cleaned up under a separate approval.) In consideration of the public comments received, EPA is requiring that sediments and vent gases be monitored under the long-term monitoring and maintenance implementation plan (MMIP).

As you are aware, the City commenced erection of the structural steel for the new school prior to the issuance of this Approval. In response to EPA concerns, the City wrote on June 14, 2005, to state that the construction work would not disturb PCB contaminated soils nor compromise the City's ability to comply with the conditions of the final Approval. At that time, EPA informed the City that any construction prior to issuance of an approval would be at the City's own risk. Note that Approval Condition 9 requires the City to notify EPA in writing of the scheduled date of commencement of on-site activities at least three business days before conducting any work under this Approval. As provided in Condition 10 of the Approval, the issuance of the Approval does not affect EPA's authority to take enforcement or regulatory action for any violations of the federal PCB regulations. Therefore, EPA continues to reserve its authority to take enforcement action for violating Condition 9 should we find that the City did not meet its commitments in the June 14, 2005 letter.

EPA has determined that the City's proposed plan is acceptable and that there will be no unreasonable risk to public health or the environment when the remediation and subsequent monitoring and maintenance are conducted in accordance with the Application and this Approval. Therefore, the City may proceed with this project, subject to the conditions of Attachment 1.

Should you have any questions on this matter, please contact Kimberly Tisa at (617) 918-1527.

Sincerely,

Robert W. Varney  
Regional Administrator

Attachment 1, Approval Conditions  
Attachment 2, Administrative Record  
Attachment 3, EPA Response to Comments

cc: G. Martin, MADEP  
A. Hanscom, BETA

**ATTACHMENT 1: PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS  
MCCOY FIELD, HATHAWAY BOULEVARD  
NEW BEDFORD, MASSACHUSETTS**

**GENERAL CONDITIONS**

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. §2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to *PCB remediation waste* identified in the Application, specifically the PCB waste located at McCoy Field (the Site).
  - a. This Approval does not address PCB contaminated sediments in the wetlands adjacent to the Site. A separate TSCA approval is required for the wetlands cleanup plan. The City of New Bedford (City) submitted a wetlands cleanup plan to EPA on June 21, 2005. This cleanup plan is currently under review by EPA.
  - b. This Approval requires an assessment of potential PCB contamination at the New Bedford High School property. The City shall conduct an assessment of potential PCB contamination both indoors and outdoors and shall submit a cleanup plan for EPA review and approval. In the alternative, the City shall submit documentation that cleanup of this property is not required under TSCA and the federal PCB regulations at 40 CFR Part 761. The City shall submit the required documentation by June 2006. This does not preclude the applicability of regulatory requirements under the Massachusetts Contingency Plan.
  - c. This Approval requires an assessment of potential PCB contamination on nearby private properties, at the existing Keith Middle School, and at the associated school athletic fields. The City shall conduct an assessment of the City-owned properties and the nearby privately-owned properties (if authorized by the private property owners.) If PCB contamination is identified, the City shall submit a cleanup plan for EPA review and approval. In the alternative, the City shall submit documentation that cleanup of these properties is not regulated under TSCA and the federal PCB regulations at 40 CFR Part 761. The City shall submit the required documentation by June 2006. This does not preclude the applicability of regulatory requirements under the Massachusetts Contingency Plan.
2. The City shall conduct on-site activities in accordance with the conditions of this Approval and the Application.
3. This Approval shall be revoked if the EPA does not receive written notification from the City of its acceptance of the conditions of this Approval within ten (10) business days of receipt.

4. In the event that the activities described in the Application differ from the conditions specified in this Approval, the conditions of this Approval shall govern.
5. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR §761.3 unless otherwise defined within this Approval.
6. The City must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the City shall contact EPA within twenty-four (24) hours for direction on sampling and cleanup requirements.
7. The City is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the City has or receives information indicating that the City or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within twenty-four (24) hours of having or receiving the information.
8. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the City are authorized to conduct the activities set forth in the Application. The City is responsible for ensuring that the City's selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
9. The City shall notify EPA in writing of the scheduled date of commencement of on-site activities at least three (3) business days prior to conducting any work under this Approval.
10. This Approval does not waive or compromise EPA's enforcement and regulatory authority, nor release the City from any other applicable requirements of federal, state or local law, including those affecting any other contaminants.

#### **USE CONDITIONS AND DEED RESTRICTION**

11. Within the paved areas of the Site, the City shall not include the thickness of the final asphalt pavement coat as part of or to satisfy the minimum 2-foot clean cover requirement.
12. Within sixty (60) days of completing the activities described in the Application and in the Approval, the City shall submit for EPA's review and approval, an Activity and Use Limitation (AUL, i.e., a deed restriction) for the Site. The AUL shall include: a description of the extent and levels of contamination at the Site following remediation; a description of the actions taken at the Site; a description of the use restrictions for the

Site; and the long-term monitoring and maintenance requirements on the Site. Within sixty (60) days of EPA's acceptance of the AUL, the City shall record the AUL in the Registry of Deeds. A copy of this Approval shall be attached to the AUL. Within fifteen (15) business days of the recording, the City shall submit to EPA a copy of the AUL, with a certification(s) by an authorizing official that the City has recorded the AUL and Approval as required above.

13. Any modification(s) in the plan, specifications, or information submitted by the City, contained in the Application, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The City shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.

If such modification involves a change in the use of the Site which results in exposures not considered in the Application, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information from the City needed to make a determination regarding potential risk.

#### **SALE, LEASE OR TRANSFER OF SITE**

14. The City shall notify the EPA of the sale, lease or transfer of any portion of the Site, in writing, no later than thirty (30) days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s). In the event that the City sells, leases or transfers any portion of the Site, the City shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner through the issuance of a new approval. The procedures for the issuance of a new approval ("re-issued approval") are as follows:
  - a. The new owner(s), lessee or transfer entity must request, in writing, that the EPA issue a new approval to the new owner(s), lessee or transfer entity which transfers some or all responsibilities to comply with the terms and conditions of this Approval to that entity or entities; and,
  - b. The EPA reviews the request, and determines whether to issue a new approval; and,

- c. The new owner(s), lessee or transfer entity provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the re-issued approval. The re-issued approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or transfer entity of its acceptance of, and intention to comply with, the terms and conditions of the re-issued approval within thirty (30) days of the date of the re-issued approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the City.
  - d. In the event that the sale, lease or transfer of the Site will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the re-issued approval if it finds, due to the change in use, that this risk-based cleanup and disposal action will not be protective of health or the environment. The new owner shall record any amendment to the AUL, resulting from any approved modification(s), within sixty (60) days of such change(s).
15. In any sale, lease or transfer of the Site, the City shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval for groundwater, vent gas, wetland sediment, and indoor air monitoring and for maintenance of the caps, except as provided above.

#### **INSPECTION, MODIFICATION AND REVOCATION CONDITIONS**

16. The City shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the City to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
17. Within sixty (60) days of receipt of this Approval, the City shall submit for EPA's review and approval, a detailed long-term monitoring and maintenance implementation plan (MMIP) for the caps and for groundwater, wetland sediment, vent gas, and indoor air quality monitoring. At a minimum, this MMIP shall include: a description of the activities that will be conducted, including cap inspection criteria, frequency, and routine maintenance activities; groundwater, vent gas, wetland sediment, and indoor air quality monitoring locations; sampling protocols, sampling frequency, and analytical criteria; and reporting requirements.

The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including teachers, parents, students, other on-site workers, and interested stakeholders. The MMIP also shall include a worker training component for maintenance or landscaping workers or for any person that will be conducting work that could impact the Site caps, including

pavement, landscaping areas, and building floors/foundations. The worker training plan must include a requirement for ongoing training and written certification of such training.

The City shall incorporate any changes to the MMIP required by EPA. Activities required under the MMIP shall be conducted until such time that EPA and the Massachusetts Department of Environmental Protection (MADEP) determine, in writing, that such activities are no longer necessary.

18. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
19. Any misrepresentation or omission of any material fact in the Application or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
20. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities present an unreasonable risk to public health or the environment; if EPA finds that there is migration of PCBs from the Site; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. The City may apply for appropriate modifications in the event new rules, standards, or guidance come into effect.

#### **RECORDKEEPING AND REPORTING CONDITIONS**

21. The City shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required by Subparts J and K. The City shall maintain a written record of the cleanup and the analytical sampling for activities conducted under this Approval, at City Hall and at the Site. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.
22. The City shall submit a Final Completion and Inspection Report (Report) to the EPA within 120 days of completion of the activities described under this Approval. At a minimum, this Report shall include: a discussion of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed of off-site; copies of manifests; copies of certificates of disposal or similar certifications issued by the disposer, if applicable; and any additional report required under the Massachusetts Contingency Plan,

including the As-Built Construction Report. The Report shall also include a Completion Statement signed and sealed by a registered Licensed Site Professional or Professional Engineer in the Commonwealth of Massachusetts verifying that the activities have been implemented in accordance with this Approval and the Application.

23. As required under Condition 17 of this Approval, the City shall submit the results of the long-term monitoring and maintenance activities to EPA and MADEP as specified in the final MMIP to be approved by EPA and MADEP.

24. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
1 Congress Street, Suite 1100 - CPT  
Boston, Massachusetts 02114-2023  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

25. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

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End of Attachment 1

## **ATTACHMENT 2: ADMINISTRATIVE RECORD**

### **A. APPLICATION DOCUMENTS**

- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) May 26, 2005 letter responding to VERSAR May 19, 2005 risk assessment comments*
- *William D. Sweet (ATSDR) to Kimberly Tisa (EPA), Health Consultation on McCoy Field Site, post remediation and after building construction. May 25, 2005.*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) May 24, 2005 letter clarifying comments contained in May 18, 2005 letter*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) letter responding to EPA Supplemental Comments on Risk-Based Application, May 18, 2005 and attached Risk-Based Cleanup Request, Rev. 2, May 18, 2005*
- *May 19, 2005 Versar Comments on Risk-Based Cleanup Request Risk Assessment Calculations*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA), Transmittal of Summary of Supplemental EPA Review Comments on Risk-Based Cleanup Application, via e-mail May 16, 2005*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA), Transmittal of Summary of EPA Review Comments on Risk-Based Cleanup Application, via e-mail May 12, 2005*
- *Letter from Scott Alfonse (City of New Bedford) to Kimberly Tisa (EPA), May 10, 2005*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA), Transmittal of Written Certification for Risk-Based Cleanup Request, Rev. 1, via e-mail May 9, 2005*
- *Memorandum from Cyndee Fuller (ESS) to Al Hanscom (BETA), Revision of Risk-based Air Concentrations for PCBs and comparison with MADEP air guidance, May 9, 2005*
- *Risk Based Cleanup Request, School Site at McCoy Field, New Bedford, Massachusetts, Revision 1, May 3, 2005, Volumes I and II*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) letter dated April 29, 2005 responding to EPA April 5, 2005 memo on technical design of engineered cap*
- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) letter dated May 2, 2005, responding to EPA April 19, 2005 comments on Risk-Based Cleanup Request, Rev. 0, March 21, 2005*

- *Alan Hanscom (BETA) to Kimberly Tisa (EPA) letter dated May 2, 2005, responding to Versar April 14, 2005 comments on Risk-Based Cleanup Request, Rev. 0, March 21, 2005*
- *Kimberly Tisa (EPA) to Scott Alfonse (City of New Bedford) letter dated April 19, 2005 transmitting comments on Risk-Based Cleanup Request, March 21, 2005*
- *Yoon-Jean Choi (EPA) to Kim Tisa (EPA), Comments on Proposed Engineered Cap, April 5, 2005*
- *Robert W. Varney (EPA) to Mayor Frederick M. Kalisz, Jr. (City of New Bedford) regarding cleanup application for the Keith Middle School Project, March 30, 2005*
- *Scott Alfonse (City of New Bedford) to Kimberly Tisa (EPA), Risk-Based Cleanup Request, Rev. 0, March 21, 2005*

## **B. ADDITIONAL DOCUMENTS**

- *Kim Tisa (EPA) to McCoy Field File, Technical Support Document – McCoy Field Risk-Based Approval, August 22, 2005*
- *Matthew J. Thomas, Esq.,(City of New Bedford) to Douglas Gutro (EPA), June 14, 2005, letter regarding erection of structural steel*

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End of Attachment 2